

Federal Communications Commission

WASHINGTON, D.C.

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JAN - 7 2002

Federal Communication Commission
Bureau/Office

In the Matter of)

Amendment of Section 73.606(b))

Table of Allotments)

Analog Television Broadcast Station)

(Tupelo, Mississippi) FIN-127474)

MM Docket No. 00-__

RM-__

RECEIVED

JAN - 7 2002

To: Chief, Video Services Division

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION FOR RECONSIDERATION

KB Prime Media LLC ("KB Prime"), applicant for a new NTSC television station on Channel 49, Tupelo, Mississippi, by its counsel and pursuant to Section 1.106 of the Commission's Rules, hereby petitions for reconsideration of the Commission's dismissal of its Petition for Rulemaking to change the channel of the new television allotment at Tupelo, Mississippi.¹ By letter dated December 6, 2001, the Commission dismissed KB Prime's Petition

¹ KB Prime Media LLC and United Television, Inc. ("United") were the sole mutually exclusive applicants for a new NTSC facility on Channel 35, Tupelo, Mississippi. On July 13, 2000, the parties jointly filed the above-referenced Petition for Rulemaking seeking to substitute and allot Channel 49 at Tupelo, Mississippi. On May 8, 2001, the FCC incorrectly dismissed both parties' pending applications. After KB Prime brought the error to the Commission's attention, KB Prime's application was subsequently reinstated by letter dated June 5, 2001. However, it is unclear if United ever sought or obtained reinstatement of its application. Furthermore, in preparing the instant Petition for Reconsideration, United's counsel indicated that United was no longer interested in pursuing its application. Thus, this Petition is filed on behalf of the sole remaining applicant for the new Tupelo channel.

for Rulemaking based on alleged interference to a Class A station in Birmingham, Alabama.² As set forth herein, by a very slight change in the technical proposal contained in the Petition -- the specification of a frequency offset-- the Commission's sole concern can be resolved. Given that the LPTV and Class A interference standards were unclear, this extremely minor change should now be accepted. As such, the Commission should reconsider its dismissal of the above-referenced Petition for Rulemaking and initiate the requested rulemaking proceeding.

BACKGROUND

KB Prime Media LLC and United Television, Inc. each filed competing applications for a new NTSC facility on Channel 35 at Tupelo, Mississippi (*see* FCC File Nos. BPCT-19960920LX and BPCT-19960920IU, respectively). On November 22, 1999, the Commission opened a filing window permitting, among other things, applicants for new NTSC television stations to modify their proposals to eliminate potential digital television (DTV) conflicts.³ On July 13, 2000, in response to that filing window, the parties jointly filed a Petition for Rulemaking seeking to substitute and allot NTSC Channel 49 for the proposed NTSC Channel 35 at Tupelo, Mississippi. Subsequently, by letter dated December 6, 2001, the Commission dismissed the Petition for Rulemaking, stating that it would cause harmful interference to a Class A television station in Birmingham, Alabama.

DISCUSSION

The Commission's letter dismissing the Petition for Rulemaking states that the proposal fails to meet the interference requirements of Section 73.623. At the time when the Petition for

² Notice of this action occurred on December 6, 2001, therefore the instant Petition seeking reconsideration is timely filed within 30 days of that date.

³ See Public Notice, DA 99-2605 (released November 22, 1999); Public Notice, DA 00-536 (released March 9, 2000) (extending the filing window until July 15, 2000).

Rulemaking seeking to substitute and allot Channel 49 at Tupelo was filed, however, the consideration of the interference potential towards Class A LPTV stations was based on the provisions of OET Bulletin No. 69. At that time, it was unclear what standard the Commission would use to determine interference protection to Class A television stations. It now appears, however, that the Commission will not permit the use of OET Bulletin No. 69 to demonstrate compliance with these interference requirements at the allotment stage. Instead, the Commission has decided to require interference protection based solely on contour overlap. This decision has never been announced in any public notice or similar general announcement. Because at the time the Petition for Rulemaking was initially filed the Commission did not make clear what interference standard would apply to review of pending petitions seeking modification of the NTSC Table of Allotments, KB Prime should be permitted to amend the Petition to correct the minor issue raised by the Commission and the Commission should reinstate the Petition for Rulemaking, as amended.

KB Prime has re-examined and revised the engineering proposal for a new NTSC station on Channel 49 based on the standard that the Commission will now require for interference protection showings at the allotment stage. Submitted herewith as Attachment 1 is a revised engineering showing that modifies the Petition for Rulemaking to substitute and allot NTSC Channel 49 at Tupelo, Mississippi. This engineering amendment, prepared on behalf of KB Prime by the engineering firm du Triel, Lundin, & Rackley, Inc., resolves the single issue raised by the Commission in its December 6, 2001 letter by simply specifying a frequency offset. (*See Attachment 1.*) With this extremely minor adjustment, the proposed NTSC station on Channel 49 will provide the required protection to Class A television station W49AY, Birmingham, Alabama. Therefore, as demonstrated in the attached engineering statement, Channel 49 can be

substituted for the current Channel 35 NTSC allotment at Tupelo in compliance with the FCC's rules regarding NTSC allotment changes.

The Commission should be lenient in processing long-pending applications for new NTSC television stations, such as KB Prime's, and any associated Petitions for Rulemakings. The party herein has identified an acceptable channel for a new television station and has expended considerable time, money and effort over the past five years attempting to bring a new television service to Tupelo. In the instant situation, the Commission dismissed the Petition for Rulemaking based on an unannounced change in Commission policy that occurred after the Petition was filed in July 2000. Fundamental fairness dictates that applicants such as KB Prime must be afforded an opportunity to amend their pending petitions and at least be given a chance to meet the new standard.

Indeed, in previous similar situations, the Commission has afforded pending applicants the opportunity to amend their pending applications to comply with a change in Commission rules or processing standards. Following the Commission's adoption of new rules in 1980 implementing a computerized contour overlap method for predicting interference among translators and low power television applications, the Commission afforded all pending applications a 90-day period during which they could file major or minor amendments to bring their applications into compliance with the newly adopted technical and engineering standards.⁴ In the instant case, the Commission should be even more lenient in permitting applicants to

⁴ Low Power Television Report and Order, 51 RR 2d 476 (1980), at ¶ 56; Public Notice 51 RR 2d 1275 (1982). *See also* Las Manzanitas Television Company, 99 FCC 2d 1241 (1985) (discussing the Commission's grant of a full opportunity for all applicants to amend their pending applications for LPTV stations or modifications in order to comply with newly imposed contour overlap standard and to attempt to remove any conflicts with existing stations).

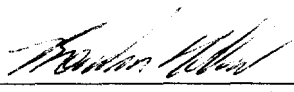
amend their rulemaking proposals, as the interference identified by the Commission in this case is the result of an unannounced change in policy. Therefore, the parties were unaware of the standard and had no opportunity to ever comply with the rule. Furthermore, the issues raised by the Commission are very minor and can be resolved by a simple modification of the technical proposal.

CONCLUSION

For the reasons stated above, the Commission should reinstate KB Prime's Petition for Rulemaking, as amended, and initiate the requested rulemaking proceeding to substitute and allot NTSC Channel 49 for Channel 35 at Tupelo, Mississippi.

Respectfully submitted,

KB PRIME MEDIA LLC

By: 
David D. Oxenford
Brendan Holland

Its Attorneys

Shaw Pittman LLP
2300 N Street, NW
Washington, DC 20037
(202) 663-8000

Date: January 7, 2002

ATTACHMENT 1

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RECONSIDERATION
TO MODIFY THE NTSC ALLOTMENT TABLE
FACILITY ID: 127474
TUPELO, MISSISSIPPI

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of KB Prime Media LLC (KB), in support of a *Petition for Reconsideration* of the FCC's dismissal of the KB proposal to modify the NTSC allotment at Tupelo, Mississippi by the proposed substitution of channel 49 for channel 35.

KB filed a *Petition for Rulemaking* (FCC File No. BPRM-20000717AER, Facility ID: 127474) to substitute channel 49 for the channel 35 NTSC allotment at Tupelo. The Federal Communications Commission (FCC) recently issued a letter¹ dismissing the channel 49 *Petition for Rulemaking*, stating the proposal failed to meet the interference requirements of Section 73.623(c)² of the Commission's Rules with respect to Class A station W49AY, Birmingham, Alabama. This *Petition for Reconsideration* was prepared to address the interference issue with Class A station W49AY and modify the proposal to permit compliance with the Commission's interference criteria.

¹ Letter dated December 6, 2001 from Clay C. Pendarvis, Chief, Television Branch, Video Services Division, Mass Media Bureau (RE: 2-A726).

² Section 73.623(c) applies to DTV stations. Therefore, it is believed that the applicable Section should be 73.613.

Specifically, it is proposed to operate with the same parameters proposed the *Petition for Rulemaking* (BPRM-20000717AER), except the **frequency offset will be changed from zero "0" to plus "+"**. By proposing a plus "+" offset, the proposal will eliminate prohibited contour overlap with respect to Class A station W49AY. Class A station W49AY is discussed below.

W49AY, Birmingham, AL

Class A station W49AY is licensed (BLTTL-19920218JN) for operation on channel 49 at Birmingham, Alabama with a non-directional effective radiated power (ERP) of 0.970 kilowatts, an antenna radiation center height above mean sea level (RCAMSL) of 366 meters, and a "zero" frequency offset. Based on the modified channel 49 facilities it is believed the necessary protection will be provided to W49AY.

Proposed NTSC Channel 49 Facilities

NTSC channel 49 can be substituted and allotted to Tupelo, Mississippi in compliance with the principle community coverage requirements of section 73.685(a) at the following reference coordinates, Latitude 33° 55' 37", Longitude 88° 33' 36". Operation on channel 49 from the proposed site appears permissible with a directional maximum effective radiated power (ERP) of 5000 kilowatts, an HAAT of 219 meters, and a **"+" frequency offset**. It is noted that a directional operation is proposed in order to provide the necessary protection toward co-channel DTV station WAFF-DT at Huntsville, Alabama.

The proposed transmitter site would meet the Commission's minimum separation requirements to analog (NTSC) allotments specified in Section 73.610. The proposed channel 49 operation also complies with the FCC's interference criterion with respect to DTV allotments and authorized DTV facilities provided in Section 73.623(c). Therefore, it is proposed to modify the NTSC allotment at Tupelo with the following specifications:

State & City	NTSC Channel	NTSC ERP (kW)	Antenna HAAT (m)
MS, Tupelo	49(+)	5000 (DA)	219

It is proposed to amend the NTSC Table of Allotments, Section 73.606(b) of the Commission's Rules, as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Tupelo, Mississippi	9, 35	9, 49

It is proposed to allot UHF channel 49 at Latitude 33° 55' 37", Longitude 88° 33' 36". The channel 49 facility proposes operation with an antenna radiation center height above mean sea level (RCAMSL) of 292 meters, an antenna radiation center height above average terrain of 219 meters, and a directional antenna maximum ERP of 5000 kilowatts. The directional operation proposes the use of an Andrew ATW-C4 "cardioid" type antenna (FCC Antenna ID: 35464), and employ a **plus "+" frequency offset**.

Figure 1 is a separation study toward other NTSC and DTV allotments based on a 161 kilometer "buffer". As

indicated, the allotment reference point is fully-spaced to all other NTSC station's or allotments. With respect to DTV allotments, the separation requirements can be used as an indication of which DTV stations have the potential of receiving interference from the proposed channel 49 NTSC operation.

Figure 2 provides a polar graph and tabulation of the horizontal plane relative field pattern for the proposed Andrew ATW-C4 "cardioid" directional antenna.

Figure 3 provides a summary of interference and service for the proposed channel 49 NTSC allotment. Determination of interference was made in accordance with the procedures adopted in the FCC's Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket No. 87-268 and outlined in OET Bulletin No. 69.³ Studies indicated that the proposed channel 49 operation would not cause prohibited interference to any DTV allotments, and therefore the proposed operation is in full compliance with the FCC's interference criterion with respect to pertinent DTV allotments.

Figure 4 is a map which depicts the City Grade (80 dBu), Grade A (74 dBu), and Grade B (64 dBu) contours for the proposed channel 49 NTSC operation. The city limits of Tupelo based on the 2000 Census data, are also

³ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. An Alpha based processor computer system was employed.

shown. As indicated, all of Tupelo is located within the predicted City Grade contour. Therefore, the proposed channel 49 NTSC allotment will comply with the FCC's city coverage requirements.

Figure 5 is a tabulation of all co-channel and adjacent channel Class A station which could potentially be adversely impacted by the proposed channel 49 NTSC operation. As indicated on Figure 5, it is believed that the proposed operation on NTSC channel 49 at Tupelo will not adversely impact any of the tabulated co-channel or pertinent adjacent channel Class A stations.

Conclusion

Channel 49 can be substituted for the current channel 49 NTSC allotment at Tupelo, in compliance with the FCC rules concerning NTSC allotment changes.


Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237

January 4, 2002

TV - TV Separation Study

Job Title : Proposed Ch. 49

Separation Buffer 161 km

Zone : 2

FCC TV DB Date : 01/02/02

Channel 49 (680-686 MHz)

Coordinates : 33-55-37 88-33-36

Call	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
Status	St	FCC File No.	Zone	HAAT(m)	Longitude	True (km)	(km)

	SENATOBIA		*34(-)	.000	34-37-02	301.1	150.56
ALLOC.	MS	-	II	0	89-58-03		30.66
							CLEAR
961001	SENATOBIA		*34(-)	1100	34-51-05	308.2	167.88
APP	MS BPET	-19961001	II	169	90-00-19		47.98
							CLEAR
960724	SENATOBIA		*34(-)	5000 DA	34-50-57	308.0	168.02
APP	MS BPET	-19960724	II	195	90-00-33		48.12
							CLEAR
960716	SENATOBIA		*34(-)	138	34-50-57	308.0	168.14
APP	MS BPET	-19960716	II	195	90-00-39		48.24
							CLEAR
960701	SENATOBIA		*34(-)	77.6	34-41-46	300.2	172.54
APP	MS BPET	-19960701	II	66	90-11-21		52.64
							CLEAR
	MAGEE		34(+)	.000	31-52-18	205.9	252.93
ALLOC.	MS	-	III	0	89-43-54		133.03
							CLEAR
960920	MAGEE		34(+)	1510	31-49-30	207.8	262.94
APP	MS BPCT	-19960920	III	98	89-51-35		143.04
							CLEAR
	TUPELO		35(+)	.000	34-15-42	339.3	39.74
ALLOC.	MS	-	II	0	88-42-48		-55.96
							SHORT
WIIQ	DEMOPOLIS		*41(o)	1950 DA	32-22-01	159.4	184.69
LIC	AL BLET	-19960221	III	333	87-52-03		153.29
							CLEAR
WIAT	BIRMINGHAM		42(+)	5000	33-29-02	106.4	169.89
LIC	AL BLCT	-19961001	II	421	86-48-21		74.19
							CLEAR
WKDH	HOUSTON		45(+)	1854 DA	33-47-40	253.3	51.01
CP MOD	MS BMPCT	-20010207	II	491	89-05-16		19.61
							CLEAR
WAFF	HUNTSVILLE		48(-)	1170	34-42-39	64.3	205.65
LIC	AL BLCT	-19800724	II	579	86-32-07		117.95
							CLEAR
NEW	TUPELO		49(o)	5000 DA	33-55-37	0.0	0.00
ADD	MS BPRM	-20000717	II	219	88-33-36		
	CARROLLTON		49(-)	.000	33-34-48	95.9	325.04
ALLOC.	GA	-	II	0	85-04-36		44.24
							CLEAR

TV - TV Separation Study

Job Title : Proposed Ch. 49
Zone : 2
Channel 49 (680-686 MHz)

Separation Buffer 161 km
FCC TV DB Date : 01/02/02
Coordinates : 33-55-37 88-33-36

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WDKA LIC	PADUCAH KY BLCT	-19970616	49(o) II	2450 327	37-23-42 88-56-23	355.0	386.31 105.51	280.8 CLEAR
ADD	CAMDEN AR	-	49(-) II	1510 175	33-16-19 92-42-11	260.4	391.35 110.55	280.8 CLEAR
KKYK-T LIC	CAMDEN AR BLCT	-20000412	49(-) II	3020 175	33-16-19 92-42-12	260.4	391.38 110.58	280.8 CLEAR
WPXX-T CP MOD	MEMPHIS TN BMPCT	-19920501	50(o) II	1320 315	35-12-41 89-48-54	321.5	183.22 95.52	87.7 CLEAR
NEW ADD	CENTER POINT AL BPRM	-20000717	51(+) II	.000 0	33-05-51 86-53-38	120.4	180.08 148.68	31.4 CLEAR
ADD	CENTER POINT AL	-	51(+) II	.000 0	33-05-51 86-53-38	120.4	180.08 148.68	31.4 CLEAR
960710 APP	JACKSON MS BPCT	-19960710	51(o) II	5000 554	32-41-25 89-52-06	221.8	183.47 152.07	31.4 CLEAR
960920 APP	TUSCUMBIA AL BPCT	-19960920	52(+) II	1510 126	34-40-46 87-54-35	35.3	102.73 71.33	31.4 CLEAR
ALLOC.	TUSCUMBIA AL	-	52(+) II	.000 0	34-43-54 87-41-54	41.2	119.41 88.01	31.4 CLEAR
ALLOC.	HUNTSVILLE-DECATUR AL	-	54(o) II	.000 0	34-36-12 86-58-42	62.2	163.87 132.47	31.4 CLEAR
961213 APP	MEMPHIS TN BPET	-19961213	*56(o) II	3020 332	35-09-14 89-49-18	320.1	178.72 83.02	95.7 CLEAR
961118 APP	MEMPHIS TN BPET	-19961118	*56(o) II	1170 296	35-12-41 89-48-54	321.5	183.22 87.52	95.7 CLEAR
961211 APP	MEMPHIS TN BPET	-19961211	*56(o) II	407 270	35-12-41 89-48-54	321.5	183.22 87.52	95.7 CLEAR

TV - TV Separation Study

Job Title : Proposed Ch. 49

Separation Buffer 161 km

Zone : 2

FCC TV DB Date : 01/02/02

Channel 49 (680-686 MHz)

Coordinates : 33-55-37 88-33-36

Call	City		Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
Status	St	FCC File No.	Zone	HAAT(m)	Longitude	True	(km)	(km)
	MEMPHIS		56(o)	.000	35-08-58	315.3	192.55	95.7
ALLOC.	TN	-	II	0	90-02-56		96.85	CLEAR
	ARAB		56(-)	.000	34-19-00	76.6	195.36	95.7
ALLOC.	AL	-	II	0	86-29-42		99.66	CLEAR
960722	ARAB		56(-)	5000	34-21-03	75.8	201.10	95.7
APP	AL BPCT	-19960722	II	504	86-26-25		105.40	CLEAR
961211	MEMPHIS		*56(o)	5000 DA	35-28-03	319.4	227.02	95.7
APP	TN BPET	-19961211	II	356	90-11-27		131.32	CLEAR
970331	MEMPHIS		*56(o)	4470 DA	35-28-03	319.4	227.02	95.7
APP	TN BPET	-19970331	II	379	90-11-27		131.32	CLEAR
	TULLAHOMA		64(+)	.000	35-27-11	51.8	279.08	119.9
ALLOC.	TN	-	II	0	86-08-20		159.18	CLEAR

TV - DTV Separation Study

Job Title : Proposed Ch. 49

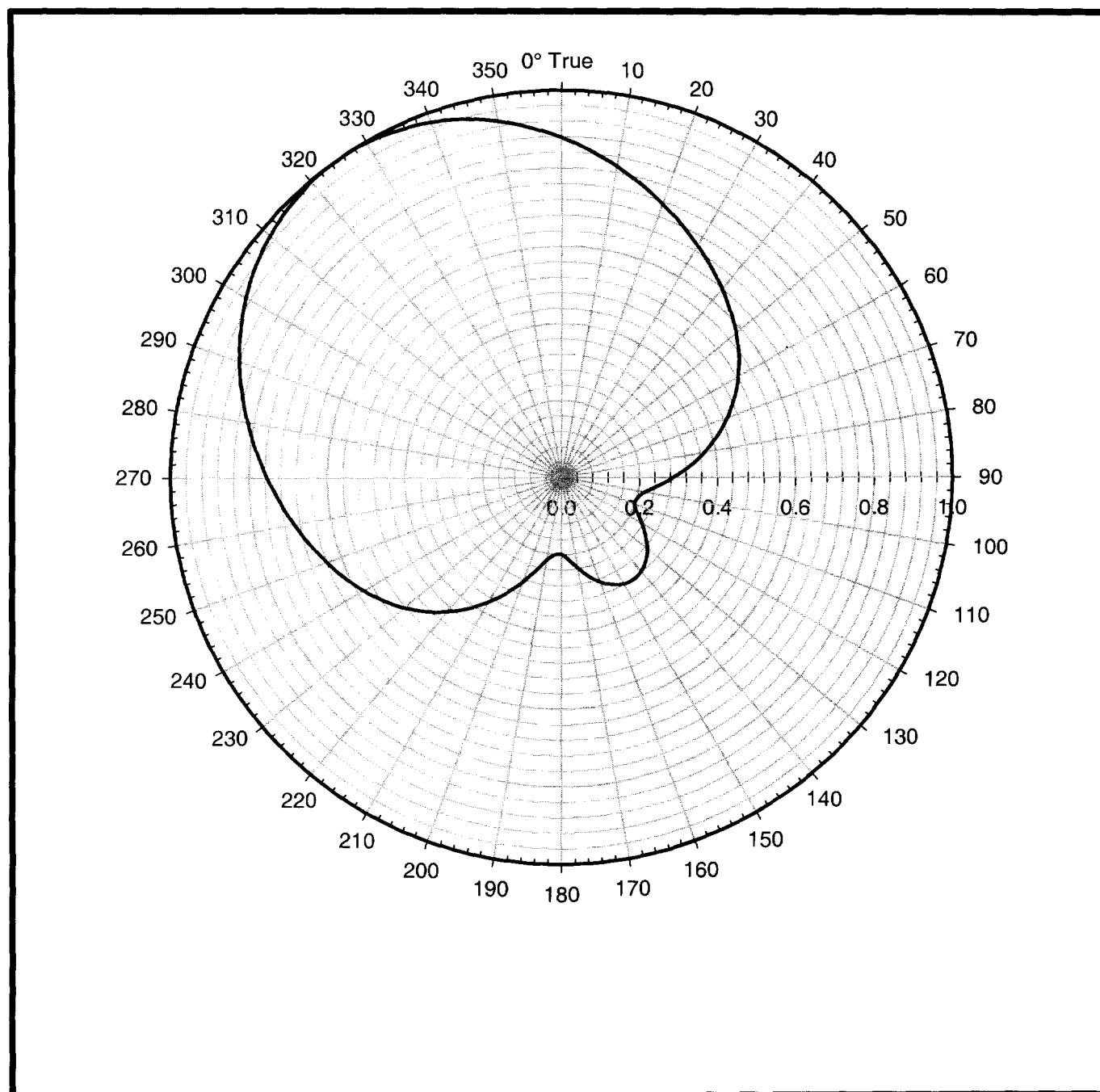
Separation Buffer 161 km

Zone : 2

Channel 49 (680-686 MHz)

Coordinates : 33-55-37 88-33-36

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
DWTOKTV DTVALT	MERIDIAN MS		49 III	1000 165	32-19-38 88-41-28	184.0	177.84 -66.76	244.6 SHORT
WTOK-D CP	MERIDIAN MS BPCDT -19991028		49 III	175 165	32-19-38 88-41-28	184.0	177.85 -66.75	244.6 SHORT
DWAFF DTVALT	HUNTSVILLE AL		49 II	50 579	34-42-39 86-32-07	64.3	205.64 -38.96	244.6 SHORT
WAFF-D CP	HUNTSVILLE AL BPCDT -19991028		49 II	50 DA 571	34-42-39 86-32-07	64.3	205.65 -38.95	244.6 SHORT
DKVTJ DTVALT	JONESBORO AR		49 II	57.2 305	35-53-27 90-54-06	316.3	305.39 60.79	244.6 CLEAR
KVTJ CP	JONESBORO AR BPCDT -19990930		49 II	1000 DA 295	35-36-16 90-31-18	316.7	258.63 14.03	244.6 CLEAR
WAWD-D CP	FT. WALTON BEACH FL BPCDT -19991105		49 III	39.8 DA 56	30-23-49 86-30-27	153.2	436.69 192.09	244.6 CLEAR
DWXTX DTVALT	COLUMBUS GA		49 II	50 345	32-27-40 84-52-43	114.4	379.84 135.24	244.6 CLEAR
WXTX CP	COLUMBUS GA BPCDT -19991027		49 II	1000 DA 319	32-27-40 84-52-43	114.4	379.84 135.24	244.6 CLEAR
DWNTZ DTVALT	NATCHEZ MS		49 III	82.2 316	31-40-08 91-41-30	230.2	385.68 141.08	244.6 CLEAR
WNTZ APP	NATCHEZ MS BMPCDT-20011116		49 III	790 DA 549	31-52-33 90-54-35	224.5	316.35 71.75	244.6 CLEAR
WNTZ CP	NATCHEZ MS BPCDT -19991027		49 III	1000 DA 313	31-40-08 91-41-30	230.2	385.68 141.08	244.6 CLEAR
DWBRCTV DTVALT	BIRMINGHAM AL		50 II	1000 420	33-29-19 86-47-58	106.2	170.29 64.29	12.0/106.0 CLEAR
WBRC-D CP	BIRMINGHAM AL BPCDT -19991004		50 II	1000 373	33-29-19 86-47-58	106.2	170.30 64.30	12.0/106.0 CLEAR



HORIZONTAL PLANE RELATIVE FIELD PATTERN

NEW TV STATION
TUPELO, MISSISSIPPI
CH 49 5000 KW (MAX-DA) 219 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
TUPELO, MISSISSIPPI

Tabulation of Horizontal Relative Fields

Azimuth (deg. True)	Relative Field	Azimuth (deg. True)	Relative Field
0	0.878	180	0.199
10	0.816	190	0.217
20	0.754	200	0.286
30	0.695	210	0.371
40	0.639	220	0.452
50	0.584	230	0.523
60	0.523	240	0.584
70	0.452	250	0.639
80	0.371	260	0.695
90	0.286	270	0.754
100	0.217	280	0.816
110	0.199	290	0.878
120	0.237	300	0.933
130	0.287	310	0.975
140	0.318	320	0.997
150	0.318	330	0.997
160	0.287	340	0.975
170	0.237	350	0.933

Extra Bearing(s)			
325	1.000		

Figure 3

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
TUPELO, MISSISSIPPI

Interference and Service Summary

I. Interference Caused

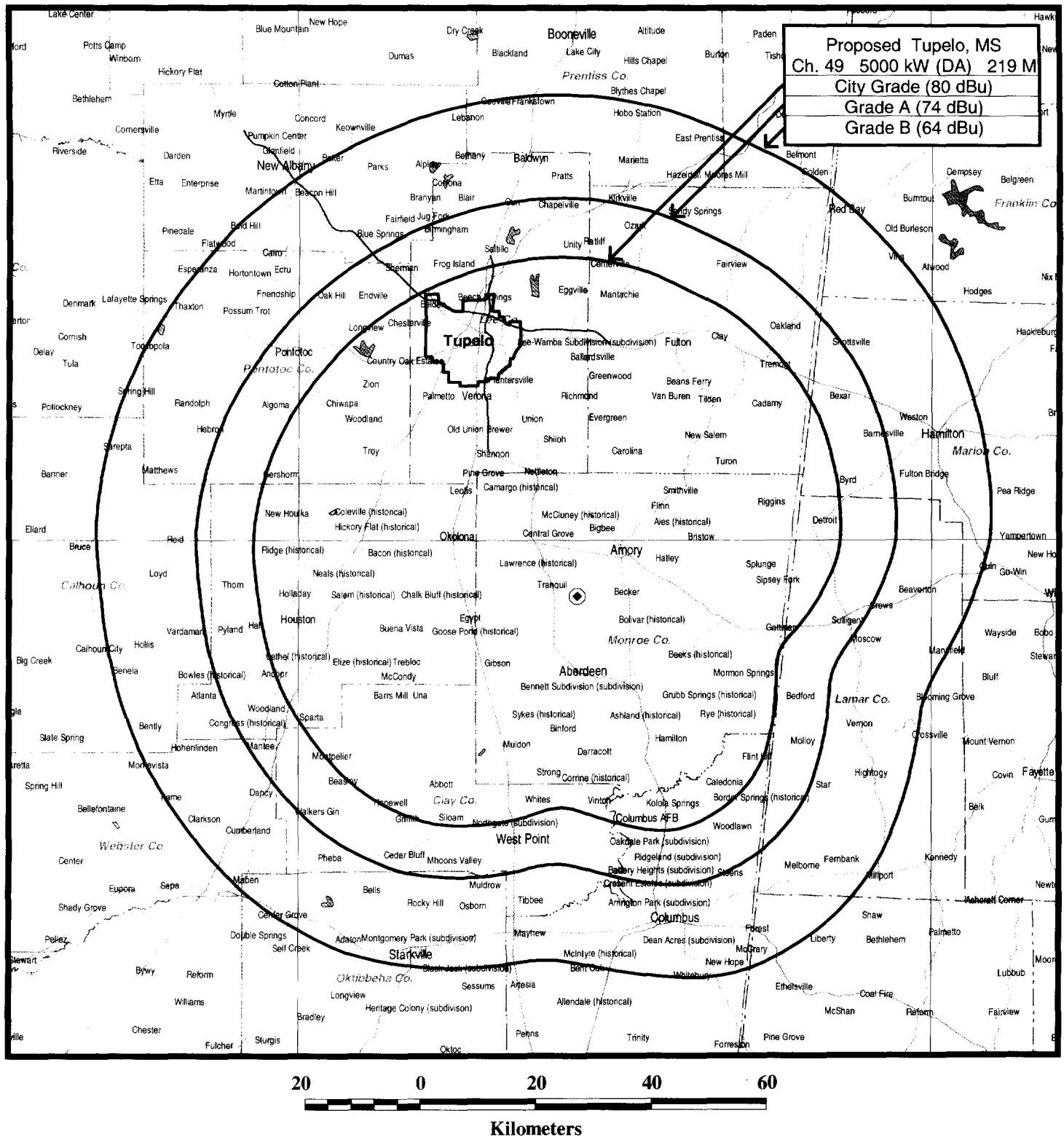
Protected DTV Station	FCC Service Population	Interference Population	Unique Interference Population*
WTOK-DT, DTV Ch. 49 Meridian, MS (App.)	198,835	657 (0.33%)	
DWTOKTV, DTV Ch. 49 Meridian, MS (Alt.)	290,000	1,179 (0.41%)	
WAFF-DT, DTV Ch. 49 Huntsville, AL (App.)	795,147	3,700 (0.47%)	3,385 (0.43%)
DWAFF, DTV Ch. 49 Huntsville, AL (Alt.)	816,000	2,192 (0.27%)	
KVTJ-DT, DTV Ch. 49 Jonesboro, AR (App.)	674,932	932 (0.14%)	
DKVTJ, DTV Ch. 49 Jonesboro, AR (Alt.)	256,000	318 (0.12%)	

*Considers interference "masking" from other NTSC and DTV assignments.

II. Service

	2000 U.S. Population Within
Grade B Contour	342,655

Figure 4



PREDICTED COVERAGE CONTOURS

NEW TV STATION
 TUPELO, FLORIDA
 CH 49 5000 KW (MAX-DA) 219 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5

Potentially Impacted Class A LPTV Stations

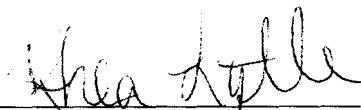
Call Status	City State	FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance (km) (mile)
W49AY LIC	BIRMINGHAM AL	BLTTL-920218JN	49(o)	.97 209 max.	33-29-02 86-48-35	106.44	169.54 105.37
WDGA-LP APP	DALTON GA	BPTTL-980601NC	49(+)	10.4 DA 363 max.	34-44-00 85-01-03	73.59	338.06 210.10

FROM CH. 47; CALL SIGN CHANGED FROM W47BA EFF. 07-01-98.

CERTIFICATE OF SERVICE

I, Rhea Lytle, a secretary with the law firm of Shaw Pittman, hereby certify that a copy of the foregoing "**PETITION FOR RECONSIDERATION**" was served via U.S. mail on this 7th day of January 2002 to the following:

Marvin J. Diamond, Esq.
Hogan & Hartson, LLP
555 13th Street, N.W.
Washington, D.C. 20004



Rhea Lytle